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San Diego County Water Authority

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January 16, 2007

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County of San Diego

Ms. Dale Hoffman-Floerke
Salton Sea PEIR Comments
Department of Water Resources
Colorado River and Salton Sea Office
1416 Ninth Street, Room 1148-6
Sacramento, CA 95814

RE: **Comments on the Draft Programmatic Environmental Impact Report for the
Salton Sea Ecosystem Restoration Program (SCH#2004021120)**

Dear Ms. Hoffman-Floerke:

The San Diego County Water Authority (Water Authority) is the public agency responsible for providing supplemental water to almost 3 million residents in western San Diego County. Up to 90 percent of San Diego water supplies originate from outside the county (e.g., the Colorado River and the Sacramento Bay-Delta); imported water ensures continued public health and safety, as well as the economic vitality of the region.

Because imported supplies are crucial to San Diego County, the Water Authority is a participant in the Colorado River Quantification Settlement Agreement (QSA). The QSA will help California stay within its 4.4 million acre-feet annual appropriation of Colorado River water, allow limited transfers of water from agricultural to urban uses, and mitigate for water transfer-related environmental resource impacts to the Lower Colorado River, Imperial Valley, and Salton Sea. Additionally, legislation related to the QSA requires preparation of the Salton Sea Ecosystem Restoration Program (SSERP). Therefore, it is vital that the preferred alternative for Salton Sea restoration be consistent with the commitments of QSA water transfers.

As part of its commitment to the QSA, the Water Authority is providing a portion of the funding for mitigation efforts associated with impacts to the Salton Sea, Lower Colorado River, and Imperial Valley. The preferred alternative selected to implement the SSERP must be designed so that it does not place demands on water supplies that would undermine the QSA water transfers, while still allowing maximum feasible attainment of three key environmental objectives stated in QSA-related legislation: (1) restoration of long term stable aquatic and shoreline habitat for the historic levels and diversity of fish and wildlife that depend on the Salton Sea; (2) elimination of air quality impacts from the restoration project; and (3) protection of water quality.

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The Water Authority understands that a more detailed, project-specific Environmental Impact Report (EIR) will be prepared for the selected preferred alternative. However, the alternatives analysis currently contained the draft Programmatic EIR raises concerns that could affect selection of the preferred alternative:

1. The analysis does not use a consistent basis for evaluating each alternative. Two alternatives (#4 and #7) do not incorporate the same assumptions regarding long-term air quality management as the other six alternatives. The Final PEIR should be revised to incorporate consistent, basic assumptions for each alternative so that comparable analyses can be conducted for all of the alternatives.
2. The analysis does not accurately reflect current alternative design criteria. Again, at least two alternatives (#4 and #7) have undergone extensive revisions since initially identified and analyzed in the draft PEIR. The Final PEIR should be revised to incorporate these design changes so that comparable analyses can be conducted for all the alternatives.

The Water Authority will continue to be involved in the SSERP process and appreciates the opportunity to provide input on this important issue. Please direct any questions you have regarding this response to either Bill Tippetts (858-522-6784) or me (858-522-6752) at the above address.

Sincerely,

A handwritten signature in cursive script that reads "Laurence Purcell".

Laurence Purcell
Water Resources Manager